

JAP:RMT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-826

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UNITED STATES OF AMERICA

TO BE FILED UNDER SEAL

- against -

COMPLAINT AND AFFIDAVIT IN
SUPPORT OF ARREST WARRANT

RODNEY LORENZO,

(T. 18, U.S.C. § 32(c))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL LEWIS, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI"), duly appointed according to law and acting as such.

Upon information and belief, on or about and between April 2009 and November 2009, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RODNEY LORENZO did willfully impart and convey threats to interfere with or disable individuals engaged in the authorized operation of a civil aircraft, to wit: flight crews of American Airlines ("AA") passenger aircraft, with an apparent determination and will to carry the threat into execution, all contrary to Title 18, United States Code, Section 32(c).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

¹ Because the purpose of this Complaint is to establish only probable cause to arrest, I have not set forth a

1. In or about April 2009, AA corporate headquarters received two envelopes containing identical copies of a typewritten letter stating that the letter was from a former AA employee who had been mistreated and terminated by the airline. The letter also stated, in relevant part:

Because, your disorganized management team failed to collect my employee handbook with all sorts of vital information, I have taken it upon myself to have the sections with the most "sensitive" material duplicated and shipped to 25 muslim charity organizations both here and in the UK.

. . . Karma is certainly a beautiful thing, isn't it? Hopefully, these charity groups don't have malicious intent or you will start to see your planes fall out of the sky one by one. AA ENJOYS RUINING FORMER EMPLOYEE'S LIVES. Although, not for long, ASSHOLES.

FUCK YOU GUYS ALL!

2. The two envelopes containing these letters bore a handwritten return address of "AA JFK Int'l Airport Flushing, NY 11733," although one of the return addresses was crossed out. One envelope was postmarked April 7, 2009 from Forest Hills, New York, and the other appeared to have been similarly postmarked, although the postmark date was inadvertently removed by AA employees upon opening.

3. In or about November 2009, AA corporate headquarters received two envelopes containing identical copies

description of all the facts and circumstances of which I am aware.

of a second typewritten letter. The two envelopes containing that letter bore handwritten addresses and return addresses. One envelope was postmarked November 2, 2009 from Jamaica, New York and the other appeared similarly postmarked, although the postmark was inadvertently removed by AA employees upon opening. Each envelope also bore the handwritten word, "Boom!!" The letter stated in relevant part:

Because AA's managers went to great lengths to destroy my life, including making sure I would never get another job in aviation in this country ever again, it is now time I fight back and fight back hard this time: I have, therefore, taken the liberty of making hundreds of copies of safety sensitive material from my handbook (an example is enclosed) and I will mail it to Islamic charities back here and in the UK, and AA aircraft itself, will transport it to those destinations.

Karma will soon bite back and your aircraft will begin to fall from the sky like dead birds. Your safety record will become worse than it already is and "accidents" will appear as your own faults.

Remember. You have brought this upon yourselves and you will eventually end up with the blood of your passengers on your hands.

In the name of Allah, this company will soon see its demise and AA will no longer exist.

We will pray for your souls.

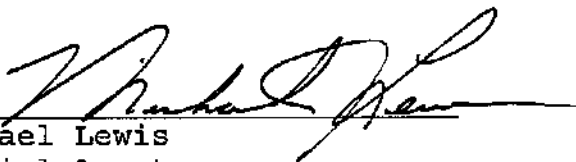
Good bye.

4. Enclosed with the letters were two pages from the AA in-flight manual's safety and security section, including information on emergency cockpit entrance procedures.

5. Investigators noted that the two letters to AA discussed above seemed to be similar in appearance and content to two unsigned letters that had been sent to another AA employee in 2009. The first of these letters, sent in or around March 2009, contained threats to the employee and the employee's daughter. The second letter, sent in or around April 2009, contained a greeting card that included photographs of decapitated and mutilated women. Investigators suspected that the letter and card were sent by the defendant RODNEY LORENZO because LORENZO had previously had a workplace altercation with the employee during an AA flight, during which LORENZO threw a coffee pot at that other employee, leading to LORENZO's termination by AA. Investigators conducted a handwriting analysis comparing the handwriting on the envelopes sent to the AA employee with handwriting samples known to belong to LORENZO and concluded that the handwriting on the envelopes was LORENZO's. This case was prosecuted in the District Court of Maryland for Baltimore County, resulting in a 90-day jail sentence imposed on June 1, 2010. LORENZO served 41 days, and the remainder of the sentence was suspended.

6. Investigators subsequently conducted a handwriting comparison between the handwriting on the envelopes sent to AA in or about April 2009 and November 2009 and handwriting samples known to belong to the defendant RODNEY LORENZO and concluded that handwriting on the envelopes sent to AA also matched LORENZO's handwriting.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant RODNEY LORENZO so that he may be dealt with according to law.


Michael Lewis
Special Agent
Federal Bureau of Investigation

Sworn to before me this
19th day of July, 2010

United States Magistrate Judge
Eastern District of New York